

5051 Westheimer Road | Houston, Texas 77056 | (713) 989-2000

REC'D SEP 2 4 2012 APCO

Via Certified Mail

September 21, 2012

Kansas Department of Health and Environment (KDHE) Bureau of Air Air Compliance and Enforcement Section 1000 SW Jackson, Suite 310 Topeka, Kansas 66612-1366

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Re:

Subpart ZZZZ Notification Panhandle Eastern Pipe Line Company, LP **Louisburg Compressor Station**

Source ID No. 1210015

Dear Sir:

Panhandle Eastern Pipe Line Company, LP (Panhandle) is providing an initial notification for two 619 horsepower compression ignition (diesel) emergency engines that were started-up on August 29, 2012 (Unit No. 728) and August 30, 2012 (Unit No. 729). Panhandle received a construction approval dated June 22, 2012 from KDHE regarding the engines.

No initial notifications are required for these engines under the New Source Performance Standard (NSPS) Subpart JJJJ rule. The engines are also subject to the NESHAP Subpart ZZZZ rule but only the initial notification requirements.

According to §63.6590(b) because they are emergency engines, they are not subject to Subpart A and are only subject to the Subpart ZZZZ initial notification requirements of §63.6645(f). The elements of this notification are provided below.

As per $\S63.9(b)(2)(i)$ through (v), the following information is provided: 40 CFR 63.9(b)(2)(i) – The name and address of the owner or operator. Panhandle Eastern Pipe Line Company, LP, 5051 Westheimer, Houston, Texas 77056 (owner and operator)

40 CFR 63.9(b)(2)(ii) - The address (i.e., physical location) of the affected source.

29115 Metcalf Road

Louisburg, Kansas 66053

40 CFR 63.9(b)(2)(iii) – An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.

According to §63.6590(a)(2), the stationary reciprocating internal combustion engines (RICE) are classified as new because they have a site rating of more than 500 horsepower, are located at a Major Source of Hazardous Air Pollutants (HAPs), and construction commenced on or after December 19, 2002. According to §63.6590(b) because they are emergency engines, they are not subject to Subpart A and are only subject to the Subpart ZZZZ initial notification requirements of §63.6645(f).

There is no compliance date associated with this requirement.

40 CFR 63.9(b)(2)(iv)- A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants ("HAPs") emitted.

The sources subject to the initial notification requirement are 619 horsepower compression ignition emergency engines. The emission points are the engine exhaust stacks which emit formaldehyde as the primary HAP.

40 CFR 63.9(b)(2)(v) - A statement of whether the affected source is a major source or an area source.

The Panhandle Louisburg Compressor Station is a major source for criteria pollutants and HAPs.

Please contact Marc Phillips at (713) 989-7464 if you have any questions.

Sincerely

Jim Kerns

Vice President, Operations

Cc: Kansas Compliance Officer Air Permitting and Compliance Branch U.S. EPA, Region 7 901 N. 5th Street Kansas City, KS 66101